SLOSS
INDUSTRIES
CORPORATION
3500 35th Avenue North • P.O. BOX 3527 BIRMINGHAM, AL 35207
PHONE: (205) 808-7712 FAX: (205) 808-7975 charlesjones@sloss.com

January 26, 2009

Mr. Jason Howanitz
Jefferson County Department of Health
Air Pollution Control Division
1400 Sixth Avenue South
Birmingham, AL 35202

Re: Semi-Annual Compliance Report – Coke Plant
Permit Number 4-07-0355-01
Reporting Period July 1, 2008 through December 31, 2008

Dear Mr. Howanitz:

Enclosed please find the above referenced semi-annual compliance report. It is being submitted in the USEPA FORM SIXMON – 6 MONTH MONITORING REPORT format. The report includes deviations from permit requirements determined through daily testing and inspection results as required by 40 CFR Part 61, 40 CFR Part 63.311(d), Chapter 8 Section 26.11 of the Jefferson County Department of Health Regulations, 40 CFR Part 63, Subpart CCCCC, and Sloss' Coke Plant Title V Permit. Information required in this report is included or attached as follows:

Coke Oven NESHAP

No coke oven gas was vented during the reporting period, January 1, 2008 through June 30, 2008. Normal operation requires coke oven gas only be vented through the bypass/bleeder stack flare system during process malfunctions or emergencies.

Maintenance outages/malfunctions that occurred during the reporting period are listed in Section D of this report. No Method 303 coke oven work practices were required to be implemented during the reporting period, July 1, 2008 through December 31, 2008.

Title V Air Permit #4-07-0355-01

Attachment 1 – Byproducts LDAR Monitoring Data
Visual and Organic Vapor Analysis (OVA) monitoring was performed weekly, monthly, and quarterly during the reporting period. A total of 51,924 components were inspected during the reporting timeframe. A total of 140 components were determined to be leaking and required repair. No other leaks in the By-products process equipment or gas blanketing lines were discovered during this reporting period.

The pumps observed with visible emissions during the reporting period are listed in Sections D and E. They were repacked weekly, as required.

Attachment 2 - Final Cooler Monitoring Data

Attachment 3 - Method 303 Data

Attachment 4 – Battery Stack and Quench Tower Data

Attachment 5 - Corrective Action Documentation for Stacks and Quench Towers

Attachment 6 – Title V Oven Heat Input Data

Attachment 7 – Title V BTF Monitoring and Subpart FF Data

Attachment 8 – Title V Boiler, Baghouse, and Pushing Data

Attachment 9 - Title V Boiler, Baghouse, and Pushing Corrective Actions

Attachment 10 - Boiler Information

Attachment 11 - Bleeder Flare Maintenance Records
The complete maintenance checklist is conducted for Bleeder Flares Nos. 3, 4 and 5 each month. The enclosed Sloss PM Report Card indicates the letter C for completed.

MACT Data

Attachment 12 - MACT Stack COMS Data. Coke Oven Stack data from the Continuous Opacity Monitors (COMS) for Battery #3/4 and #5 Battery. This data includes calibration data, hourly, and daily averages. The emission limitation of 15% was met throughout the monitoring period. The COMs availability for #3/4 was 99.53 and #5 block availability was 99.51%. There was no out of control time for

either COMs during the reporting period. The quarterly inspection and performance audit is included.

Attachment 13 – 2008 Weekly Quench Water Analyses. Quench water is analyzed weekly for total dissolved Solids (TDS). It is also analyzed monthly for total suspended solids (TSS) which has previously been reported.

Attachment 14 - MACT Pushing Data. There were no violations of the 30% MACT pushing limitation. All ovens were observed during the quarterly reporting period.

Attachment 15 – MACT Pushing Corrective Action Reports. MACT pushing corrective actions taken for ovens which exceeded the 30% opacity limitation.

Attachment 16 - Baghouse and Quench Tower Preventative Maintenance. Information obtained through our MACT Operation and Maintenance Plan for the baghouse and quench towers is included.

If you have any questions regarding this submission, please contact us at 205-808-7712.

Sincerely,

Charles A. Jones
Coordinator, Environmental/Safety

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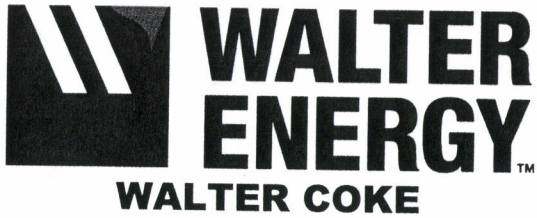

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July 31, 2009

Mr. Jason Howanitz
Jefferson County Department of Health
Air Pollution Control Division
1400 Sixth Avenue South
Birmingham, AL 35202

Re: Semi-Annual Compliance Report – Coke Plant
Permit Numbers 4-07-0355-01 and 4-07-0355-02
Reporting Period January 1, 2009 through June 30, 2009

Dear Mr. Howanitz:

Enclosed please find the above referenced semi-annual compliance report. It is being submitted in the USEPA FORM SIXMON – 6 MONTH MONITORING REPORT format. The report includes deviations from permit requirements determined through daily testing and inspection results as required by 40 CFR Part 61, 40 CFR Part 63.311(d), Chapter 8 Section 26.11 of the Jefferson County Department of Health Regulations, 40 CFR Part 63, Subpart CCCCC, and Walter Coke Plant Title V Permit. Information required in this report is included or attached as follows:

Coke Oven NESHAP

No coke oven gas was vented during the reporting period, January 1, 2009 through June 30, 2009. Normal operation requires coke oven gas only be vented through the bypass/bleeder stack flare system during process malfunctions or emergencies.

Maintenance outages/malfunctions that occurred during the reporting period are listed in Section D of this report. No Method 303 coke oven work practices were

required to be implemented during the reporting period, January 1, 2009 through June 30, 2009.

Title V Air Permit Nos. 4-07-0355-01 and 4-07-0355-02

Attachment 1 – Byproducts LDAR Monitoring Data

Visual and Organic Vapor Analysis (OVA) monitoring was performed weekly, monthly, and quarterly during the reporting period. A total of 25,269 components were inspected during the reporting timeframe. A total of 93 components were determined to be leaking and required repair. No other leaks in the By-products process equipment or gas blanketing lines were discovered during this reporting period.

The pumps that were observed with visible emissions during the reporting period are listed in Sections D and E. They were repacked weekly, as required. Certain monitoring data is included herewith. All other monitoring data is available for review, as requested.

Attachment 1 – Byproducts LDAR Data

Attachment 2 - Final Cooler Monitoring Data

Attachment 3 - Method 303 Data

Attachment 4 – Heat Input Data

Attachment 5 - Corrective Action Documentation for Stacks

Attachment 6 – MACT COMs Data – This is Coke Oven Stack data from the Continuous Opacity Monitors (COMS) for Battery #3/4 and #5 Battery. These data include calibration data, hourly, and daily averages. The emission limitation of 20% opacity limit for extended coking time was met throughout the monitoring period. The COMs availability for #3/4 was 98.97% and #5 block availability was 99.52%. There was no out of control time for either COMs during the reporting period. The COMs quarterly inspection and performance audit is included.

Boiler 4 - Subpart Db

A letter to JCDH dated July 31, 2009 has been submitted to your attention requesting a meeting to discuss the alternate to CEMs for SO2 Monitoring. We have conducted several years of Coke Oven Gas(COG) sampling testing via the Tutwiler Method for sulfur content and believe that this method will provide the required compliance monitoring for SO2 emission compliance.

We will not request alternate methods for either NOX or Opacity monitoring. Presently we are conducting the required 30 day CEMS testing period for all required parameters. Due to past issues of reliability with our CEMs and due to the shortage of COG due to current operating rates we have not completed this requirement.

As has been previously reported, the RATA for the required CEMs parameters was conducted on December 23, 2008. The RATA test results indicate that the emissions are below the emissions standards set forth by JCDH Permit Nos. 4-07-0335-01 and 4-07-0335-02. Daily Method 9 opacity observation have been conducted on all in-service boilers throughout the terms of the referenced Title V Permits.

If you have any questions regarding this submission, please contact us at 205-808-7712.

Sincerely,

Charles A. Jones
Coordinator, Environmental/Safety

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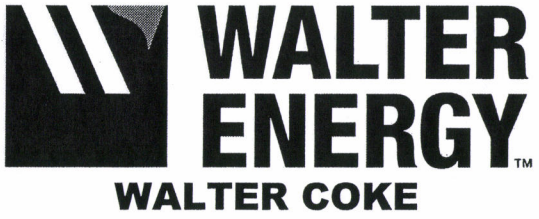

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January 29, 2010

Mr. Jason Howanitz
Jefferson County Department of Health
Air Pollution Control Division
1400 Sixth Avenue South
Birmingham, AL 35202

Re: Semi-Annual Compliance Report – Coke Plant

Permit Number 4-07-0355-02

Reporting Period July 1, 2009 through December 31, 2009

Dear Mr. Howanitz:

Enclosed please find the above referenced semi-annual compliance report. It is being submitted in the USEPA FORM SIXMON – 6 MONTH MONITORING REPORT format. The report includes deviations from permit requirements determined through daily testing and inspection results as required by 40 CFR Part 61, 40 CFR Part 63.311(d), Chapter 8 Section 26.11 of the Jefferson County Department of Health Regulations, 40 CFR Part 63, Subpart CCCCC, and Walter Coke Plant Title V Permit. Information required in this report is included or attached as follows. All other monitoring data is available for review by the Agency.

Coke Oven NESHAP

No coke oven gas was vented during the reporting period, July 1, 2009 through December 31, 2009. Normal operation requires coke oven gas only be vented through the bypass/bleeder stack flare system during process malfunctions or emergencies.

Maintenance outages/malfunctions that occurred during the reporting period are listed in Section D and E, where applicable, in this report. No Method 303 coke oven work practices were required to be implemented during the reporting period, July 1, 2009 through December 31, 2009.

Title V Air Permit No. 4-07-0355-02

Attachment 1 – Byproducts LDAR Monitoring Data

Visual and Organic Vapor Analysis (OVA) monitoring was performed weekly, monthly, and quarterly during the reporting period. A total of 26,757 components were inspected during the reporting timeframe. A total of 75 components were determined to be leaking and required repair. This included 2 exhauster leaks, 2 compressor leaks and 5 final cooler leaks. No gas blanketing lines were discovered leaking during this reporting period, however, damaged or missing insulation was noted.

The pumps that were observed with visible emissions during the reporting period are listed in Sections D and E. They were repacked weekly, as required. Certain monitoring data is included herewith. **All other monitoring data are available for review, as requested.**

Attachment 1 – Byproducts LDAR Data

Attachment 2 – Quench Water Data

Attachment 3 - Method 303 Data

Attachment 4 – Heat Input Data

Attachment 5 - Corrective Action Documentation for Stacks

Attachment 6 – MACT COMs Data – This is Coke Oven Stack data from the Continuous Opacity Monitors (COMS) for Battery #3/4 and #5 Battery. These data include calibration data, hourly, and daily averages. The emission limitation of 20% opacity limit for extended coking time was met throughout the monitoring period. The COMs availability for #3/4 was 97.8% and #5 block availability was 98.3%. There was no out of control time for either COMs during the reporting period. The COMs quarterly inspection and performance audit is included.

Attachment 7 - Boiler 4 - Subpart Db 4TH Quarter Report
We have conducted the required 30 day CEMS testing period for SO2 and NOX from October 13, 2009 through November 14, 2009. The CEMS is operating to provide continuous monitoring for SO2, NOX, O2 and Opacity. The RATA for the required CEMs parameters was conducted on December 31, 2009. The RATA test results indicate that the emissions are below the emissions standards set forth by

JCDH Permit No. 4-07-0335-02. Daily Method 9 opacity observation have been conducted on all in-service boilers throughout the terms of the referenced Title V Permits. Furthermore, we have conducted several years of Coke Oven Gas(COG) sampling testing via the Tutwiler Method for sulfur content and believe that this method will provide the required compliance monitoring for SO2 emission compliance.

If you have any questions regarding this submission, please contact us at 205-808-7712.

Sincerely,

Charles A. Jones
Coordinator, Environmental/Safety

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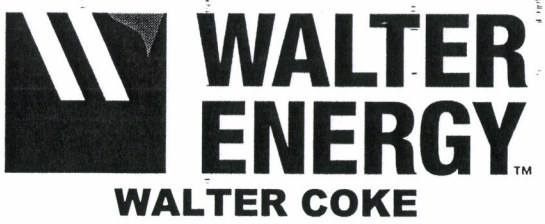

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July 30, 2010

Mr. Jason Howanitz
Jefferson County Department of Health
Air Pollution Control Division
1400 Sixth Avenue South
Birmingham, AL 35202

Re: Semi-Annual Compliance Report – Coke Plant

Permit Number 4-07-0355-02

Reporting Period January 1, 2010 through June 30, 2010

Dear Mr. Howanitz:

Enclosed please find the above referenced semi-annual compliance report. It is being submitted in the US-EPA FORM SIXMON – 6 MONTH MONITORING REPORT format. The report includes deviations from permit requirements determined through daily testing and inspection results as required by 40 CFR Part 61, 40 CFR Part 63.311(d), Chapter 8 Section 26.11 of the Jefferson County Department of Health Regulations, 40 CFR Part 63, Subpart CCCCC, and Walter Coke Plant Title V Permit. Information required in this report is included or attached as follows. All other monitoring data is available for review by the Agency.

Coke Oven NESHAP

No coke oven gas was vented during the reporting period, January 1, 2010 through June 30, 2010. Normal operation requires coke oven gas only be vented through the bypass/bleeder stack flare system during process malfunctions or emergencies.

WC-MS17

Maintenance outages/malfunctions that occurred during the reporting period are listed in Section D and E, where applicable, in this report. No Method 303 coke oven work practices were required to be implemented during the reporting period, January 1, 2010 through June 30, 2010.

Title V Air Permit No. 4-07-0355-02

Attachment 1 – Byproducts LDAR Monitoring Data for 2nd Quarter 2010
The 1st Quarter LDAR report was submitted on April 30, 2010.

Visual and Organic Vapor Analysis (OVA) monitoring was performed weekly, monthly, and quarterly during the reporting period. A total of 26,401 components were inspected during the reporting timeframe. A total of 69 components were determined to be leaking and required repair. This included 4 exhauster leaks, 3 compressor leaks and 2 final cooler leaks. Damaged insulation on gas blanketing line was documented during this reporting period.

The pumps that were observed with visible emissions during the reporting period are listed in Sections D and E. They were repacked weekly, as required. Certain monitoring data are included herewith. All other monitoring data are available for review, as required.

Attachment 1 – Byproducts LDAR Data

Attachment 2 – Method 303 Data

Attachment 3 – MACT COMS Data and Corrective Action Reports – These are Coke Oven Stack data from the Continuous Opacity Monitors (COMS) for Battery #3/4 and #5 Battery. These data include calibration data, hourly, and daily averages. The emission limitation of 15% and the 20% opacity limit for normal coking time and extended coking time respectively, were met throughout the monitoring period. The COMS availability for #3/4 was 98.1% and #5 block availability was 97.6%. There was no out of control time for either COMS during the reporting period. The COMS quarterly inspection and performance audit is included.

Attachment 4 – Quench Water Analyses

Attachment 5 – Preventative Maintenance Program Documentation

Attachment 6 – Boiler Data - Subpart Db 2nd Quarter 2010 COMS Audit Report - See the attachment in the body of the SIXMON Form for this reporting period.

If you have any questions regarding this submission, please contact us at 205-808-7712.

Sincerely,

Charles A. Jones
Coordinator, Environmental/Safety

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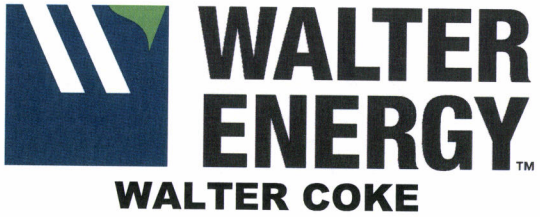

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January 28, 2011

Mr. Jason Howanitz
Jefferson County Department of Health
Air Pollution Control Division
1400 Sixth Avenue South
Birmingham, AL 35202

Re: Semi-Annual Compliance Report – Coke Plant
Permit Number 4-07-0355-02
Reporting Period July 1, 2010 through December 31, 2010

Dear Mr. Howanitz:

Enclosed please find the above referenced semi-annual compliance report. It is being submitted in the US-EPA FORM SIXMON – 6 MONTH MONITORING REPORT format. The report includes deviations from permit requirements determined through daily testing and inspection results as required by 40 CFR Part 61, 40 CFR Part 63.311(d), Chapter 8 Section 26.11 of the Jefferson County Department of Health Regulations, 40 CFR Part 63, Subpart CCCCC, and Walter Coke Plant Title V Permit. Information required to be in this report is included herewith or attached as part of this submission.. All other monitoring data is available for review by the Agency.

Coke Oven NESHAP

No coke oven gas was vented during the reporting period, July 1, 2010 through December 31, 2010. Normal operation requires coke oven gas only be vented through the bypass/bleeder stack flare system during process malfunctions or emergencies.

Maintenance outages/malfunctions that occurred during the reporting period are listed in Section D, where applicable, in this report. No Method 303 coke oven work practices were required to be implemented during the reporting period, July 1, 2010 through December 31, 2010.

Title V Air Permit No. 4-07-0355-02

Attachment 1 – Byproducts LDAR Monitoring Data for 4th Quarter 2010
The 3rd Quarter LDAR report was submitted on October 28, 2010.

Visual and Organic Vapor Analysis (OVA) monitoring was performed weekly, monthly, quarterly, semiannually and annually during the reporting period. A total of 26,160 components were inspected during the reporting timeframe. A total of 38 components were determined to be leaking and required repair. This included 0 exhauster leaks, 3 compressor leaks and 0 final cooler leaks, 9 valves, 3 flanges, 11 pressure relief devices, 2 vents and a process vessel. No damaged insulation on gas blanketing line was documented during this reporting period.

The pumps that were observed with visible emissions during the reporting period are listed in Sections D and E. They were repacked weekly, as required. Certain monitoring data are included herewith. All other monitoring data are available for review, as required.

Attachment 2 – MACT COMS Data and Corrective Action Reports – These are Coke Oven Stack data from the Continuous Opacity Monitors (COMS) for Battery #3/4 and #5 Battery. These data include calibration data, hourly, and daily averages. The emission limitation of 15% and the 20% opacity limit for normal coking time and extended coking time respectively, were met throughout the monitoring period. The COMS availability for #3/4 was 98.8% and #5 block availability was 98.5%. 3/4 Block COMs was out of control during November 2010 for 7 hours and 56 minutes. 5 Block COMs was out of control for 13 hours and 22 minutes. The COMS 4th quarterly inspection and performance audit is included.

Attachment 3 – Boiler Data - Subpart Db 4th Quarter 2010 CEMS/COMS Audit Report – The CEMs RATA was already submitted.

If you have any questions regarding this submission, please contact us at 205-808-7712.

Sincerely,

Charles A. Jones
Coordinator, Environmental/Safety

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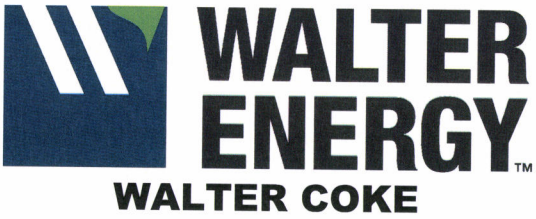

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July 29, 2011

Mr. Jason Howanitz
Jefferson County Department of Health
Air Pollution Control Division
1400 Sixth Avenue South
Birmingham, AL 35202

Re: Semi-Annual Compliance Report – Coke Plant

Permit Number 4-07-0355-02

Reporting Period January 1, 2011 through June 30, 2011

Dear Mr. Howanitz:

Enclosed please find the above referenced semi-annual compliance report. It is being submitted in the US-EPA FORM SIXMON – 6 MONTH MONITORING REPORT format. The report includes deviations from permit requirements determined through daily testing and inspection results as required by 40 CFR Part 60, Subpart Db, 40 CFR Part 61, 40 CFR Part 63.311(d), 40 CFR Part 63, Subpart CCCCC, Chapter 8 Section 26.11 of the Jefferson County Department of Health Regulations, and Walter Coke Plant Title V Permit. Information required to be in this report is included herewith. All other monitoring data is available for review by the Agency.

No coke oven gas was vented during the reporting period, January 1, 2011 through June 30, 2011. Normal operation requires coke oven gas only be vented through the bypass/bleeder stack flare system during process malfunctions or emergencies.

Maintenance outages/malfunctions that occurred during the reporting period are listed in Section D, where applicable, in this report. No Method 303 coke oven work practices were required to be implemented during the reporting period, January 1, 2011 through June 30, 2011.

Visual and Organic Vapor Analysis (OVA) monitoring was performed weekly, monthly, quarterly, semiannually and annually during the reporting period. A total of 25,792 components were inspected during the 2nd Quarter 2011 reporting timeframe. A total of 27 components were determined to be leaking and required repair. This included 1 exhauster leaks, 2 compressor leaks and 0 final cooler leaks, 3 valves, 2 flanges, 17 pressure relief devices, 0 vents, 1 screwed connection and 1 process vessel. No damaged insulation on gas blanketing lines was documented during this reporting period.

Coke Oven Stack data from the Continuous Opacity Monitors (COMS) for Battery #3/4 and #5 Battery are available for review. These data include calibration data, availability, and daily averages. The COMS availability for #3/4 was 99.0% and #5 block availability was 98.8%. 3/4 Block COMs was not out of control during the reporting period. In June 2011, 5 Block COMs was out of control for 2 hours and 40 minutes. The daily average opacity limitations of 15% and 20% for normal coking time and extended coking time respectively, were met throughout the monitoring period.

If you have any questions regarding this submission, please contact us at 205-808-7712.

Sincerely,

Charles A. Jones
Coordinator, Environmental/Safety

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